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RM-9267
Secretary
Federal Communications Commission
1919 M Street NW
Washington , D. C. 20554-0001

RECEIVED
MAY 26 1998

May 18, 1998

To the Commission:

I am writing to comment on the matter of RM-9267. My name is Paul J. Graziani. I reside at 8324 Leatrice Drive, Little Rock, Arkansas 72227-3920.

I wish to state in the beginning of these comments that I am unalterably and completely opposed to the proposal submitted to the Commission by the Land Mobile Communications Council. My arguments in opposition are as follows:

1. As the Commission is well aware, amateur radio has a long history of sharing as a secondary user of the 70 centimeter band with government services. This arrangement has worked well for both parties for over 40 years. Now a proposal has been made to totally alter this arrangement with no plan or methods presented by the LMCC as to how a new sharing arrangement could be both technically and politically achieved. One can only surmise that once commercial interests have gained primary status on the band it would be quite simple for the commercial interests to set up on frequencies used by the amateur service, in some cases used by the amateur service for decades, claim interference from a secondary user and demand the removal of said transmitter by the Commission as would be their right as a primary user. The LMCC's vague and nebulous concept of "sharing" is specious at best.

Down here in Arkansas we have a saying. "I've been to a couple of goat ropings and a county fair or two." One must be terribly naive` to accept this proposal on face value.

In central Arkansas, there have been no difficulties with sharing between the primary government users and amateur radio to my knowledge. In fact, for many years a Strategic Air Command missile wing operated out of the Little Rock Air Force Base and there was no difficulty even at that time. This was due to the types of emissions used by both parties. What the LMCC is proposing presents an entirely different set of circumstances.

2. The impact would not simply be on amateurs using the 70 centimeter band. Amateur repeaters in the 10, 6, 2, and 1-1/4 meter bands use control links on the 70 centimeter band. Due

to the location of many repeater sites, the use of land line control in lieu of radio control is either far too expensive for a voluntary noncommercial service or physically impossible. Since the loss of 2 megahertz of the 1-1/4 meter band, the band has become much more crowded. In some urban areas it is fully loaded. With the introduction of the codeless technician license, the band has become much more popular among amateurs. The movement of additional control links into the 1-1/4 meter band would prove extremely difficult in some urban areas.

In some areas the 2 meter band has become extremely crowded.

The use of repeaters on 70 centimeters has relieved this situation to some extent.

3. The most important aspect of this potential change is the affect on emergency communications. Approximately half of the state of Arkansas is hilly or has some rugged terrain. There have been instances where disasters such as floods or tornados have occurred in valleys and physical conditions were such that it was impossible to use available repeaters due to terrain. In such cases, vehicles have been parked on higher elevations and the 70 centimeter band has been used to remotely link to 2 meter repeaters with hand held radios. In other cases, the actual use of a temporary 70 centimeter repeater to allow point to point communications over the disaster area was used. High gain portable antennas are very easily constructed for use on the 70 centimeter band and lend themselves to easy portable communications as is often needed in disaster situations.

In northeast Arkansas, there is deep concern about the New Madrid earthquake fault. It has been predicted by disaster professionals that most bridges and transportation access will be unavailable with bridge destruction and road subsiding. Part of the disaster plan for this area involves the use of amateur radio operators in aircraft relaying amateur television pictures of the disaster area over amateur television
relaying visual information to disaster officials.

If the LMCC plan is adopted, it is highly likely that even if amateur repeaters still exist on a secondary basis, there is a strong likelihood that many of the agencies who are LMCC members would be using the same frequencies. Due to the fact that the LMCC entity was primary user as well as the fact that emergency communications would be occurring on the frequency, no amateur use of the frequencies would be permitted. This precludes the use of amateur radio in many settings in this state.

State and local officials will readily agree that amateur radio has been essential in providing disaster communications during many disasters in this state. When a class F-4 tornado struck the central Arkansas area on March 1, 1997, all means of communications were needed including amateur radio. Our local county judge found amateur radio was the best means for keeping him informed of where the most critical emergency needs were. A number of lives were saved through the quick action of amateur radio when no other communications systems were available or severely overloaded.

The loss of the 70 centimeter band or the introduction of incompatible modes or services would greatly impair or eliminate the service amateur radio provides in this setting. It is doubtful if the LMCC entities could or would provide such voluntary communication services in such a situation. Either the LMCC entity would be actively involved in their own disaster communications or would feel no need to allow the use of their frequencies Which leads to the next point.

3. Since a majority of the 70 centimeter band would be useless to amateurs under the LMCC proposal, there is no way the loss of 20 megahertz of spectrum can be accommodated in the remaining 10 megahertz. (430 MHz. - 440 MHz.) Portions of this remaining spectrum are already in use for weak signal and space communications. Not only does this affect the users of 70 centimeters directly but also those using amateur repeaters on the 10, 6, 2 and 1-1/4 meter bands.

The question arises, will the LMCC members compensate a voluntary noncommercial service when the amateur service will have to purchase new equipment to establish control links and repeaters on higher frequencies to replace those lost in the LMCC plan? Amateurs using their own resources relied on a long standing relationship with the primary users of the band. Will the LMCC entities fill in the void left by amateur radio no longer being able to assist with emergency communications as in the past with the use of the 70 centimeter band? Some repeaters in the lower bands will simply go off the air rather than the owners having to purchase new linking equipment arising from any plan such as that proposed by the LMCC. This represents a potential loss to both individual amateurs and the communities they serve. I ask the question again; Will the LMCC make up the loss?

Submitted by,

Paul J. Graziani W5ZK
8324 Leatrice Drive
Little Rock, Ar 72227-920
wp
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Secretary
Federal Communications Commission
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May 21, 1998

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